

Case: 4:22-cv-01194-AGF
TIME RECEIVED
February 4, 2024 at 4:52:25 PM EST

Doc. #: 11
REMOTE CSID
3145217964

Filed: 02/04/24
DURATION
82

Page: 1 of 5
PAGES
5

PageID #: 45
STATUS
Received

01/01/2013 00:01 3145217964

R. HARRIS

PAGE 01/05



This page
intentionally
left blank

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION**

ROSALIND D. HARRIS,

Plaintiff,

vs.

UNIVERSITY OF MISSOURI,

Defendant.

Case: No. 4:22-CV-01194- AGF

AMENDED PLEADING

Dated this 5th day of February, 2024

Comes now, Rosalind D. Harris (herein after Plaintiff), of 61 Wayside Dr., St. Louis, Missouri 63135 in complaint for a civil case against the University of Missouri (herein after UM) of 105 Jessie Hall, Columbia, MO 65211.

1. Plaintiff's civil rights are being violated by the system.
2. Plaintiff is a program beneficiary of the system having written a thesis in 2004 that is

cataloged system wide.

3. Plaintiff's book is held at the University of Missouri St. Louis. Plaintiff disputes how the book was cataloged and the fact that it is archived. Plaintiff's thesis is successful. Plaintiff was not told about university policy for issues extending beyond completion of study and thus, presents to this court for copy right protection.
4. Plaintiff decries this act of malicious trespass perpetrated by UM (Rs. Mo Sec. 537.330). UM did a wrongful taking of her chattels a la *Hornbeck Offshore Transp., LLC v United States* (569 F. 3d 506, 511-12).
5. UM actions compel Plaintiff under Missouri Constitution Article 1 Section 8 Freedom of speech . . . to bring these claims to this court. “. . . every person shall be free to say, write or publish, . . . , being responsible for all abuses of that liberty.”
6. Plaintiff holds exclusive copy right to the work under question, therefore, making it Plaintiff's right to move and transfer.
7. Because of this, it is highly applicable to charge UM with three additional violations. 17 U.S.C. Sec. 106 (4), 17 U.S.C. Sec. 106 (5) and United States Constitution Article 1, Section 8.
8. Title 17 Copy rights Chapter 1 Subject Matter and Scope of Copyright Sec. 106 Exclusive rights in copyrighted works (4), UM violates Plaintiff's right to perform the copyrighted work publicly and (5) to display the copyrighted work publicly.
9. UM conferred a master's degree on plaintiff for the work in question here. In March of 2021 UM said the work was not accepted because of pictures contained in the book.
10. In 2013 in the 10th Circuit, the Court found that the University of New Mexico deprived

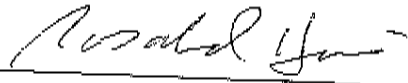
the plaintiff of the value of a dissertation by listing it in an incomplete state (*Diversey v. Schmidly*, 738 F.3d 1196).

11. In The United States we " . . . Promote the Progress of Science and the useful Arts, by securing for limited Times to Authors and Inventors the exclusive Right to their respective Writings and Discoveries (United States Constitution, Article 1, Section 8)." UM has never addressed the picture issue, only its claim to sovereign immunity.
12. UM invalidated and violated copyright and both state and federal constitutional principals. The file, The Files, shows Plaintiff's attempt at mediation but also the indifference of the university and the system.
13. Plaintiff claims \$10 million as compensation to have details from Plaintiff's August 2020 letter to Chancellor Sobolik fulfilled. Plaintiff also requests a copy for each library in the UM System with color pictures and an epilogue, and a copy on Conneiseur paper be bound and presented to the Library of Congress. These alleged wrongs continue to accrue now. Plaintiff is claiming actual damages for the acts alleged in this complaint.
14. Plaintiff claims punitive damages of \$10 million for career loss. Plaintiff's work was cataloged in a way that left a shroud of suspicion and the need to reprove the work (a nonstandard academic practice), Plaintiff has endured unnecessary duress both in school and since because of excellent work.

DECLARATION

I declare under penalty of perjury that the foregoing is both true and correct.

For the Plaintiff,



Rosalind D. Harris,
61 Wayside Drive
St. Louis, MO 63135-2835
Phone/Fax: 314-521-7964
Cellular: 314-708-1838
email: rdh221@outlook.com